

Cary Steklof			
Timekeeper	Recommended Rate	Requested Hours	Amount
Cary Steklof	\$ 375.00	1,047.80	\$ 392,925.00

Bad Faith Reduction (60.7 Hours)	\$ 22,762.50
Conflict Reduction (25.1 Hours)	\$ 9,412.50
Admin Reduction (115.3 Hours)	\$ 43,237.50
<b>Subtotal</b>	<b>\$ 317,512.50</b>
Block Bill/Vague/Excessive Reduction (20%)	\$ 63,502.50
<b>TOTAL</b>	<b>\$ 254,010.00</b>

**EXHIBIT**  
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Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
5/25/2022	C D STEKLOF	Review prior correspondence with AIG and operative policy provisions in order to draft complaint (2.7); draft complaint against AIG (2.3).	5.00	\$ 833.00	\$ 4,165.00			
5/26/2022	C D STEKLOF	Draft complaint against AIG regarding unpaid defense costs	3.00	\$ 833.00	\$ 2,499.00			
5/27/2022	C D STEKLOF	Draft complaint against AIG regarding unpaid defense costs	6.60	\$ 833.00	\$ 5,497.80			
5/31/2022	C D STEKLOF	Draft complaint against AIG regarding unpaid defense costs	6.50	\$ 833.00	\$ 5,414.50			
6/1/2022	C D STEKLOF	Draft and revise complaint against AIG and incorporate proposed changes from Mr. Andrews	5.10	\$ 833.00	\$ 4,248.30			
6/2/2022	C D STEKLOF	Analyze proposed revisions to complaint from Ms. DeField, incorporate same, and finalize complaint for client's review and approval	1.70	\$ 833.00	\$ 1,416.10			
6/6/2022	C D STEKLOF	Incorporate client revisions to complaint against AIG and draft correspondence to AIG providing filed complaint and inviting voluntary mediation	2.40	\$ 833.00	\$ 1,999.20			
6/7/2022	C D STEKLOF	Finalize complaint for filing, review exhibits to complaint, and coordinate filing of same (1.6); revise correspondence to AIG regarding opportunity to mediate prior to litigation (1.0).	2.60	\$ 833.00	\$ 2,165.80			Admin (1.6)
6/9/2022	C D STEKLOF	Address issues related to filing of complaint against AIG	0.30	\$ 833.00	\$ 249.90			Admin
6/14/2022	C D STEKLOF	Review orders entered by district court judge and magistrate judge regarding procedures applicable to litigation and relevant local rules	1.00	\$ 833.00	\$ 833.00			
6/21/2022	C D STEKLOF	Evaluate opposing counsel's request for defense cost figure and invoices and exchange various correspondence with team and client regarding same	0.90	\$ 833.00	\$ 749.70			
6/22/2022	C D STEKLOF	Review invoices compiled by client and exchange correspondence with team regarding recoverable damages in coverage suit with AIG	1.20	\$ 833.00	\$ 999.60			
6/23/2022	C D STEKLOF	Exchange correspondence regarding appropriate calculation of damages for coverage suit	0.30	\$ 833.00	\$ 249.90			
6/24/2022	C D STEKLOF	Analyze issues related to calculation of covered damages and exchange correspondence with opposing counsel regarding request for invoices connected to underlying suit	1.20	\$ 833.00	\$ 999.60			
6/26/2022	C D STEKLOF	Analyze breakdown of fees and costs incurred by U.S. Sugar, draft correspondence to client regarding additional information needed, and exchange correspondence with team regarding same	0.70	\$ 833.00	\$ 583.10			
6/28/2022	C D STEKLOF	Analyze various issues related to recoverable damages against AIG	1.30	\$ 833.00	\$ 1,082.90			
6/29/2022	C D STEKLOF	Exchange correspondence with opposing counsel regarding request for defense cost information and review spreadsheet compiled by client regarding same	0.40	\$ 833.00	\$ 333.20			
6/30/2022	C D STEKLOF	Analyze issues related to recoverable damages and exchange various correspondence with opposing counsel and client regarding potential mediation and total defense expenses	2.30	\$ 833.00	\$ 1,915.90			
7/1/2022	C D STEKLOF	Exchange correspondence with opposing counsel regarding mediation and waiver of service of summons	0.50	\$ 833.00	\$ 416.50			
7/6/2022	C D STEKLOF	Exchange correspondence regarding insurer's interest in mediation and potential mediators for dispute	0.90	\$ 833.00	\$ 749.70			
7/7/2022	C D STEKLOF	Exchange correspondence regarding mediation with AIG	0.20	\$ 833.00	\$ 166.60			
7/8/2022	C D STEKLOF	Exchange correspondence regarding potential mediators	0.40	\$ 833.00	\$ 333.20			
7/11/2022	C D STEKLOF	Exchange correspondence regarding potential mediators for matter	0.50	\$ 833.00	\$ 416.50			
7/12/2022	C D STEKLOF	Exchange correspondence regarding potential mediators	0.30	\$ 833.00	\$ 249.90			
7/13/2022	C D STEKLOF	Exchange correspondence regarding potential mediators and scheduling of mediation	0.60	\$ 833.00	\$ 499.80			

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
7/14/2022	C D STEKLOF	Exchange various correspondence regarding potential mediators	0.70	\$ 833.00	\$ 583.10			
7/18/2022	C D STEKLOF	Review order from court regarding service of complaint to AIG and analyze options in connection with same in light of mediation	1.30	\$ 833.00	\$ 1,082.90			
7/19/2022	C D STEKLOF	Address various issues related to mediation scheduling and exchange various correspondence with client, mediators, and opposing counsel regarding mediation alternatives in light of Spector unavailability	2.30	\$ 833.00	\$ 1,915.90			Admin
7/20/2022	C D STEKLOF	Exchange correspondence regarding mediation scheduling and new mediators	0.50	\$ 833.00	\$ 416.50			Admin
7/21/2022	C D STEKLOF	Communicate with client regarding potential mediators and AIG's request for invoices (.6); exchange various correspondence with team and opposing counsel regarding mediator selection and scheduling (1.7); exchange correspondence with opposing counsel regarding timing to answer complaint and analyze next steps in connection with same (.7).	3.00	\$ 833.00	\$ 2,499.00			Admin (2.3)
7/26/2022	C D STEKLOF	Evaluate potential alternative mediators and communicate with Mr. Andrews regarding same	0.60	\$ 833.00	\$ 499.80			
7/27/2022	C D STEKLOF	Exchange various correspondence regarding new potential mediators	0.60	\$ 833.00	\$ 499.80			
7/28/2022	C D STEKLOF	Exchange various correspondence regarding new potential mediators and draft correspondence to client regarding same	0.50	\$ 833.00	\$ 416.50			Admin
8/1/2022	C D STEKLOF	Research issues related to scheduling of new potential mediators and exchange correspondence with client and opposing counsel regarding same	1.00	\$ 833.00	\$ 833.00			Admin
8/3/2022	C D STEKLOF	Exchange correspondence regarding new potential mediators	0.60	\$ 833.00	\$ 499.80			
8/4/2022	C D STEKLOF	Address various issues related to mediation scheduling and exchange correspondence with client and opposing counsel regarding same	1.00	\$ 833.00	\$ 833.00			Admin
8/8/2022	C D STEKLOF	Draft correspondence to client regarding status of matter (.3); exchange correspondence with team regarding next steps with waiver of service and draft correspondence to opposing counsel regarding same (.9).	1.20	\$ 833.00	\$ 999.60			Admin
8/10/2022	C D STEKLOF	Exchange correspondence with client and opposing counsel regarding mediation scheduling and service of complaint	0.50	\$ 833.00	\$ 416.50			Admin
8/11/2022	C D STEKLOF	Exchange various correspondence with client regarding mediation scheduling and compilation of documents for production to carriers (.4); draft correspondence to opposing counsel regarding mediation and request for invoices (.5); coordinate filing of waiver of service and exchange correspondence with excess insurer regarding request for information (.6).	1.60	\$ 833.00	\$ 1,332.80			Admin
8/12/2022	C D STEKLOF	Exchange various correspondence with client regarding final scheduled mediation and potential filing of Motion for Judgment on the Pleadings prior to mediation	0.60	\$ 833.00	\$ 499.80			Admin
8/14/2022	C D STEKLOF	Review prior NDA agreements with AIG to evaluate appropriate terms for sharing invoices in advance of mediation	0.40	\$ 833.00	\$ 333.20			
8/15/2022	C D STEKLOF	Draft and revise proposed NDA in connection with production of invoices and documents prior to mediation and draft correspondence to client regarding same (1.9); address various issues related to litigation deadlines following answer by AIG (.4).	2.30	\$ 833.00	\$ 1,915.90			
8/18/2022	C D STEKLOF	Exchange correspondence regarding invoices for redaction and status request from excess insurer	0.20	\$ 833.00	\$ 166.60			

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
8/22/2022	C D STEKLOF	Exchange correspondence regarding necessary review of invoices for production to carrier (.2); review and analyze Answer filed by AIG and draft correspondence to client regarding same (1.1).	1.30	\$ 833.00	\$ 1,082.90			
8/23/2022	C D STEKLOF	Communicate with Mr. Andrews regarding litigation strategy and exchange various correspondence with client regarding same (.8); coordinate filing of corporate disclosure statement (.3).	1.10	\$ 833.00	\$ 916.30			Admin
8/31/2022	C D STEKLOF	Coordinate privilege review of client invoices and communicate with Ms. Chapunoff regarding same (.6); exchange various correspondence with opposing counsel regarding Rule 16 conferral and NDA (.4).	1.00	\$ 833.00	\$ 833.00			Admin (.6)
9/1/2022	C D STEKLOF	Review pleadings in case and motions for judgment on the pleadings on comparable issues and draft outline of U.S. Sugar's motion (3.0); draft motion for judgment on the pleadings (3.3).	6.30	\$ 833.00	\$ 5,247.90			
9/2/2022	C D STEKLOF	Draft Motion for Partial Judgment on the Pleadings regarding erosion of self-insured retention by defense expenses	6.70	\$ 833.00	\$ 5,581.10			
9/5/2022	C D STEKLOF	Review breakdown of invoices received from client and draft correspondence to Ms. Chapunoff regarding review of same	0.30	\$ 833.00	\$ 249.90			Admin
9/6/2022	C D STEKLOF	Communicate regarding review of invoices for production to insurer and necessary redactions.	0.50	\$ 833.00	\$ 416.50			Admin
9/6/2022	C D STEKLOF	Draft motion for partial judgment on the pleadings.	5.00	\$ 833.00	\$ 4,165.00			
9/7/2022	C D STEKLOF	Draft motion for judgment on the pleadings regarding application of self-insured retention	1.30	\$ 833.00	\$ 1,082.90			
9/10/2022	C D STEKLOF	Exchange correspondence with opposing counsel regarding NDA and Rule 26(f) conference	0.20	\$ 833.00	\$ 166.60			
9/11/2022	C D STEKLOF	Draft motion for partial judgment on the pleadings regarding erosion of self-insured retention	2.20	\$ 833.00	\$ 1,832.60			
9/12/2022	C D STEKLOF	Compile draft Joint Scheduling Report for consideration by opposing counsel (1.0); conduct Rule 26(f) conference with opposing counsel (.5); draft and revise motion for partial judgment on the pleadings (7.1).	8.60	\$ 833.00	\$ 7,163.80			
9/13/2022	C D STEKLOF	Revise motion for partial judgment on the pleadings	2.20	\$ 833.00	\$ 1,832.60			
9/14/2022	C D STEKLOF	Revise motion for partial judgment on the pleadings and incorporate proposed revisions from Mr. Andrews	2.80	\$ 833.00	\$ 2,332.40			
9/15/2022	C D STEKLOF	Communicate with Mr. Andrews regarding final revisions to Motion for Partial Judgment on the Pleadings and incorporate changes to same (2.0); review final draft of same before client review (1.2); review AIG's proposed changes and additions to joint scheduling report and incorporate changes to same (1.3).	4.50	\$ 833.00	\$ 3,748.50			
9/16/2022	C D STEKLOF	Analyze AIG's proposed NDA to govern production of invoices and evaluate additional provisions to be included	1.40	\$ 833.00	\$ 1,166.20			
9/17/2022	C D STEKLOF	Exchange correspondence regarding proposed revisions to Joint Scheduling Report	0.30	\$ 833.00	\$ 249.90			
9/19/2022	C D STEKLOF	Analyze issues related to revised NDA provided by AIG and incorporate necessary revisions to same (1.4); analyze various issues related to next steps in litigation (.4).	1.80	\$ 833.00	\$ 1,499.40			
9/20/2022	C D STEKLOF	Review and address redactions to selected defense cost invoices invoices to provide to AIG in connection with mediation	2.50	\$ 833.00	\$ 2,082.50			Admin

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
9/21/2022	C D STEKLOF	Review comments and revisions to Motion for Partial Judgment on the Pleadings and review final draft of same to prepare for filing with Court (3.7); finalize redline revisions to joint scheduling report and NDA and provide same to opposing counsel for review and comment (.7).	4.40	\$ 833.00	\$ 3,665.20			
9/21/2022	C D STEKLOF	Review and supplement redactions to invoices to be provided to AIG in advance of mediation.	3.00	\$ 833.00	\$ 2,499.00			
9/22/2022	C D STEKLOF	Review invoices for redaction before providing to AIG (1.8); exchange correspondence with client regarding status of litigation (.2).	2.00	\$ 833.00	\$ 1,666.00			Admin (.2)
9/23/2022	C D STEKLOF	Exchange correspondence with team and opposing counsel regarding request for extension on AIG's opposition to motion for judgment on the pleadings	0.30	\$ 833.00	\$ 249.90			
9/25/2022	C D STEKLOF	Draft correspondence to opposing counsel regarding joint status report	0.10	\$ 833.00	\$ 83.30			
9/26/2022	C D STEKLOF	Review correspondence from opposing counsel canceling mediation, communicate with Mr. Andrews regarding same, and draft correspondence to client with update (1.1); revise and finalize joint scheduling report for filing with court (.6).	1.70	\$ 833.00	\$ 1,416.10			Admin (1.1)
9/27/2022	C D STEKLOF	Exchange various correspondence regarding rescheduling of mediation and response to insurer's request for extension to oppose motion for judgment on the pleadings	0.70	\$ 833.00	\$ 583.10			Admin
10/3/2022	C D STEKLOF	Review various scheduling orders issued by Court and exchange correspondence regarding scheduling of new mediation	0.80	\$ 833.00	\$ 666.40			Admin
10/6/2022	C D STEKLOF	Exchange various correspondence regarding rescheduling mediation in accordance with Court order	0.40	\$ 833.00	\$ 333.20			Admin
10/7/2022	C D STEKLOF	Exchange various correspondence regarding rescheduling of mediation	0.20	\$ 833.00	\$ 166.60			Admin
10/10/2022	C D STEKLOF	Exchange various correspondence regarding scheduling of mediation	0.10	\$ 833.00	\$ 83.30			Admin
10/11/2022	C D STEKLOF	Analyze strategy in connection with motion for partial judgment on the pleadings and oral argument	0.30	\$ 833.00	\$ 249.90			
10/21/2022	C D STEKLOF	Initial review of AIG's response to motion for judgment on the pleadings and exchange correspondence regarding same	0.70	\$ 833.00	\$ 583.10			
10/22/2022	C D STEKLOF	Exchange correspondence in connection with reply in support of motion for judgment on the pleadings	0.20	\$ 833.00	\$ 166.60			
10/26/2022	C D STEKLOF	Draft correspondence to opposing counsel regarding motion for extension of time, draft and revise same, coordinate filing, and review order entered by court	1.40	\$ 833.00	\$ 1,166.20			Admin
10/28/2022	C D STEKLOF	Analyze AIG's opposition to motion for judgment on the pleadings, analyze citations to authority, and outline appropriate response	4.00	\$ 833.00	\$ 3,332.00			
10/31/2022	C D STEKLOF	Communicate with Mr. Andrews regarding key issues to address in reply and analyze new research required in connection with AIG's procedural argument against motion (.8); research additional case law to support reply (2.0); draft reply in support of motion for judgment on the pleadings (3.4).	6.20	\$ 833.00	\$ 5,164.60			
11/1/2022	C D STEKLOF	Draft reply in support of motion for judgment on the pleadings regarding self-insured retention	7.20	\$ 833.00	\$ 5,997.60			
11/2/2022	C D STEKLOF	Draft and revise reply in support of motion for partial judgment on the pleadings	6.20	\$ 833.00	\$ 5,164.60			

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
11/3/2022	C D STEKLOF	Draft and revise Rule 26 disclosures and draft correspondence to client regarding same (1.7); revise motion for partial judgment on the pleadings and incorporate comments and revisions from Mr. Andrews (4.8).	6.50	\$ 833.00	\$ 5,414.50			
11/4/2022	C D STEKLOF	Revise and finalize reply in support of motion for partial judgment on the pleadings for client review (3.2); finalize Rule 26 disclosures for service to AIG and serve same (.8); review Rule 26 disclosures from AIG (.2).	4.20	\$ 833.00	\$ 3,498.60			
11/6/2022	C D STEKLOF	Address issues related to finalizing reply in support of motion for judgment on the pleadings	0.20	\$ 833.00	\$ 166.60			
11/7/2022	C D STEKLOF	Finalize and coordinate filing of reply in support of motion for partial judgment on the pleadings and draft analysis to client regarding same	1.60	\$ 833.00	\$ 1,332.80			Admin
11/8/2022	C D STEKLOF	Draft analysis to client regarding briefing and next steps in connection with litigation	1.30	\$ 833.00	\$ 1,082.90			Admin
11/11/2022	C D STEKLOF	Exchange correspondence with opposing counsel regarding joint status report to Court	0.10	\$ 833.00	\$ 83.30			
11/18/2022	C D STEKLOF	Draft and revise joint status report to court and mediation order and exchange correspondence regarding same	2.50	\$ 833.00	\$ 2,082.50			
11/21/2022	C D STEKLOF	Analyze various issues related to joint status report and discovery going forward	0.30	\$ 833.00	\$ 249.90			
11/22/2022	C D STEKLOF	Revise proposed joint interim status report and exchange correspondence regarding same	0.70	\$ 833.00	\$ 583.10			
11/23/2022	C D STEKLOF	Draft detailed correspondence to client regarding discovery strategy and production of invoices and finalize joint interim status report for review by opposing counsel	1.70	\$ 833.00	\$ 1,416.10			Admin
11/27/2022	C D STEKLOF	Incorporate necessary revisions to joint scheduling report and draft correspondence to client regarding next steps in connection with discovery	1.30	\$ 833.00	\$ 1,082.90			Admin
11/28/2022	C D STEKLOF	Communicate with Mr. Andrews regarding litigation and joint scheduling report and incorporate revisions to same (.8); exchange various correspondence with opposing counsel to finalize report and coordinate filing of same (.9).	1.70	\$ 833.00	\$ 1,416.10			Admin (.9)
11/30/2022	C D STEKLOF	Analyze litigation strategy going forward and draft correspondence to client regarding same	0.40	\$ 833.00	\$ 333.20			Admin
12/1/2022	C D STEKLOF	Communicate with Mr. Andrews regarding case strategy and issues related to discovery (.5); communicate with Ms. Huckaba regarding case background and drafting of responses to written discovery and compile materials for her review (1.0); review AIG deposition notice and draft correspondence to client regarding same (.4); analyze discovery served by AIG to consider own discovery for service (1.2).	3.10	\$ 833.00	\$ 2,582.30			
12/2/2022	C D STEKLOF	Draft requests for production, interrogatories, and deposition notice and serve same on AIG (3.0); review discovery requests from AIG and strategize on responses to same (1.0); review order from Court granting Motion for Judgment on the Pleadings and draft correspondence to client regarding same (1.6).	5.60	\$ 833.00	\$ 4,664.80			Admin (1.6)
12/4/2022	C D STEKLOF	Analyze various issues related to upcoming discovery and production and exchange correspondence regarding same	0.60	\$ 833.00	\$ 499.80			

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
12/5/2022	C D STEKLOF	Communicate with Mr. Andrews regarding next steps in connection with discovery and litigation (.5); coordinate review and redaction of invoices for production and address issues related to deposition scheduling and discovery (1.0).	1.50	\$ 833.00	\$ 1,249.50			Admin (1)
12/6/2022	C D STEKLOF	Call with client regarding Court order and next steps in connection with discovery (1.0); analyze issues related to discovery going forward (.7).	1.70	\$ 833.00	\$ 1,416.10			Admin (1)
12/7/2022	C D STEKLOF	Analyze written discovery from AIG and outline necessary objections and responses in connection with same (1.5); address various issues related to discovery and scheduling of depositions (.3).	1.80	\$ 833.00	\$ 1,499.40			Admin (.3)
12/8/2022	C D STEKLOF	Analyze various issues related to written discovery responses (.5); address various issues regarding redaction of invoices for production (.4); exchange various correspondence regarding 30(b)(6) depositions, mediation, and various issues related to discovery (1.6).	2.50	\$ 833.00	\$ 2,082.50			Admin
12/9/2022	C D STEKLOF	Review initial draft of interrogatory responses and communicate with Ms. Huckaba regarding same (.8); exchange various correspondence regarding potential expert testimony(.3); analyze issues with deposition topics identified by AIG, confer with opposing counsel regarding same, and outline potential follow up (2.0).	3.10	\$ 833.00	\$ 2,582.30			
12/12/2022	C D STEKLOF	Analyze issues related to discovery and review analysis regarding redactions of invoices for production	0.80	\$ 833.00	\$ 666.40			
12/13/2022	C D STEKLOF	Review information provided by Mr. Schwinghammer related to AIG's written discovery and address various issues related to written responses, protective order, and potential expert	1.70	\$ 833.00	\$ 1,416.10			
12/14/2022	C D STEKLOF	Communicate with potential expert witness on fees and draft correspondence regarding same (1.0); draft and revise objections and answers to AIG's first set of requests for production (5.7).	6.70	\$ 833.00	\$ 5,581.10			
12/15/2022	C D STEKLOF	Draft and revise objections and responses to AIG's interrogatories and requests for production and communicate with Ms. Huckaba regarding finalizing same	3.90	\$ 833.00	\$ 3,248.70			
12/16/2022	C D STEKLOF	Revise and finalize written discovery responses for review by client	2.00	\$ 833.00	\$ 1,666.00			
12/18/2022	C D STEKLOF	Exchange correspondence regarding objections and responses to AIG's written discovery	0.30	\$ 833.00	\$ 249.90			
12/20/2022	C D STEKLOF	Draft and revised responses to written discovery propounded by AIG and coordinate various issues related to document production (2.8); communicate with mediator regarding initial questions related to matter and compile materials for mediator's review (.8); communicate with potential fee expert regarding background and involvement in matter (1.0).	4.60	\$ 833.00	\$ 3,831.80			
12/21/2022	C D STEKLOF	Finalize written objections and responses to AIG's written discovery, coordinate service of same, and address issues related to retention of fee expert	2.30	\$ 833.00	\$ 1,915.90			Admin
12/22/2022	C D STEKLOF	Communicate regarding review of documents for production and exchange correspondence regarding mediator engagement	0.40	\$ 833.00	\$ 333.20			
12/23/2022	C D STEKLOF	Exchange correspondence with opposing counsel regarding protective order (.4); coordinate various issues related to document production and review of materials by fee expert to compile report (.9).	1.30	\$ 833.00	\$ 1,082.90			



Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
12/25/2022	C D STEKLOF	Exchange correspondence regarding pre-mediation call with mediator and analyze upcoming tasks related to discovery	0.20	\$ 833.00	\$ 166.60			
12/26/2022	C D STEKLOF	Conduct pre-mediation calls with Mr. Andrews and mediator in preparation for session with AIG (.9); address various issues related to discovery going forward (.9).	1.80	\$ 833.00	\$ 1,499.40			
12/27/2022	C D STEKLOF	Address various issues related to discovery, compilation of expert report on fees and costs, and forthcoming motion for partial summary judgment (2.0); review redacted attorney invoices for production to AIG and communicate regarding same (2.5).	4.50	\$ 833.00	\$ 3,748.50			Admin
12/28/2022	C D STEKLOF	Strategize in preparation for mediation with AIG and research necessary in connection with forthcoming motion for partial summary judgment (1.0); communicate with Ms. Huckaba regarding necessary research into covered fees and mend the hold doctrine (.5); communicate with Mr. Schwinghammer regarding issues related to work performed between 2015 and 2019 (1.0); communicate with Mr. Schwinghammer and expert witness regarding various issues to address in connection with report (1.0); address various issues related to discovery, depositions, and production of documents to AIG (1.3).	4.80	\$ 833.00	\$ 3,998.40			
12/29/2022	C D STEKLOF	Review invoice redactions prior to production of same to AIG and communicate regarding various issues related to same (3.1); review correspondence from opposing counsel regarding potential postponement of mediation and communicate with Mr. Andrews and mediator regarding same (1.3); draft correspondence to opposing counsel regarding request to move mediation (.5); draft and revise mediation statement for review and approval by client (4.7).	9.60	\$ 833.00	\$ 7,996.80			
12/30/2022	C D STEKLOF	Complete review of redacted invoices for production to AIG, exchange correspondence with client regarding same, and draft correspondence to opposing counsel regarding production of same under mediation privilege (1.5); review and finalize proposed confidentiality order to be entered by court and provide same to opposing counsel (.8); communicate with Mr. Andrews and Mr. Schwinghammer regarding invoices to be included within damage model (1.0); revise and finalize mediation statement for mediator (.7).	4.00	\$ 833.00	\$ 3,332.00			
1/2/2023	C D STEKLOF	Exchange various correspondence regarding joint notice to court on jurisdiction and expert report (1.0); analyze documents to be compiled for production to AIG and draft correspondence regarding same (.8); communicate with fee expert regarding content of report (.6); analyze various issues related to discovery, expert disclosures, and upcoming litigation tasks (1.8).	4.20	\$ 869.00	\$ 3,649.80			
1/3/2023	C D STEKLOF	Draft correspondence to opposing counsel regarding U.S. Sugar's opposition to extensions of remaining litigation deadlines (.7); review draft expert reports and conduct numerous calls with expert, Mr. Schwinghammer, and Mr. Andrews regarding necessary revisions to same and additional material to incorporate (6.5); draft and revise expert disclosures to accompany expert report (.6); coordinate service of expert report and disclosures to AIG (.5).	8.30	\$ 869.00	\$ 7,212.70			Admin (.5)



Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
1/4/2023	C D STEKLOF	Communicate with client regarding litigation strategy going forward (.6); address issues related to expert production and documents provided (.4); review AIG's motion to extend all remaining deadlines by 90 days (.9).	1.90	\$ 869.00	\$ 1,651.10			Admin (.6)
1/5/2023	C D STEKLOF	Analyze appropriate response to AIG's motion to extend remaining deadlines and trial by 90 days (.7); outline and draft opposition to motion for extension (8.4).	9.10	\$ 869.00	\$ 7,907.90			
1/6/2023	C D STEKLOF	Draft opposition to AIG's motion to extend remaining deadlines and trial	4.40	\$ 869.00	\$ 3,823.60			
1/7/2023	C D STEKLOF	Draft opposition to AIG's motion to extend remaining deadlines and trial	1.50	\$ 869.00	\$ 1,303.50			
1/8/2023	C D STEKLOF	Draft and revise opposition to AIG's motion to extend remaining deadlines and trial	3.60	\$ 869.00	\$ 3,128.40			
1/9/2023	C D STEKLOF	Revise and finalize opposition to AIG's motion to extend remaining deadlines and trial (3.1); compile exhibits to opposition and coordinate filing of same (.6); review materials in preparation for mediation with insurers (1.0); address various issues related to discovery and upcoming production (.4).	5.10	\$ 869.00	\$ 4,431.90			Admin (.6)
1/10/2023	C D STEKLOF	Prepare for and attend mediation with AIG (6.5); analyze next steps in light of failure to settle (1.0).	7.50	\$ 869.00	\$ 6,517.50			
1/11/2023	C D STEKLOF	Review spreadsheet from client regarding past payments from CoOp and communicate with Ms. Rush and Ms. Chapunoff regarding issues to address with same and backup to locate (1.4); review order from Court denying AIG's motion for extension and draft update to team in connection with same (1.0); conduct meet and confer with opposing counsel regarding U.S. Sugar's discovery responses and analyze potential revisions to responses (1.5); draft correspondence regarding issue to address to finalize confidentiality order with AIG (.7); address various issues related to offensive and defensive discovery, additional documents for production, and next steps in connection with litigation (1.1).	5.70	\$ 869.00	\$ 4,953.30			Admin (1.4)
1/12/2023	C D STEKLOF	Draft correspondence to opposing counsel to finalize content of confidentiality order (.5); analyze issues related to filing of confidentiality order with Court, draft notice to accompany same, coordinate filing, and draft correspondence to magistrate judge (1.6); exchange various correspondence regarding scheduling of 30(b)(6) depositions (.5); analyze issues related to missing invoice backup for production to AIG (.5); review additional documents for production to AIG and those to be withheld (1.4); analyze issues related to privilege log for production and draft correspondence to team regarding same (1.4).	5.90	\$ 869.00	\$ 5,127.10			Admin (1.6)
1/13/2023	C D STEKLOF	Communicate regarding issues related to finalizing production to AIG (.3); draft detailed analysis to client regarding recommendations involving disputed discovery requests from AIG and review responses to same (2.3).	2.60	\$ 869.00	\$ 2,259.40			Admin (2.3)

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
1/17/2023	C D STEKLOF	Draft detailed correspondence to client and team regarding additional investigation in connection with amended discovery responses and issues to address (1.5); analyze necessary amendments to written discovery responses (1.0); draft correspondence to AIG regarding improper attempt to set discovery hearing with magistrate (1.2).	3.70	\$ 869.00	\$ 3,215.30			Admin (1.5)
1/18/2023	C D STEKLOF	Analyze next steps in connection with amendments to written discovery responses and potential production of additional documents (1.0); address various issues related to client's collection of additional documents for production and coordinate call to address same (1.0); review final privilege log and documents for production to insurers and coordinate service of discovery to AIG (1.3); address various issues related to discovery and depositions going forward (.7).	4.00	\$ 869.00	\$ 3,476.00			
1/19/2023	C D STEKLOF	Communicate with client regarding additional materials to be compiled for production (.6); analyze AIG's written discovery responses and annotate same in preparation for meet and confer with opposing counsel (1.5); communicate with Mr. Andrews regarding issues related to discovery and privilege log (.6); meet and confer with opposing counsel and draft notes regarding next steps (1.1); analyze research related to various discovery and [REDACTED] to be used in connection with discovery disputes and summary judgment briefing (1.3).	5.10	\$ 869.00	\$ 4,431.90	Bad Faith (1.3)		Admin (.6)
1/20/2023	C D STEKLOF	Exchange various correspondence regarding discovery issues, amendments to written discovery responses, and deposition scheduling going forward	1.00	\$ 869.00	\$ 869.00			Admin
1/22/2023	C D STEKLOF	Analyze various correspondence relating to amendment of written discovery responses and exchange correspondence regarding same (.8); address various issues related to expert deposition scheduling and discovery issues (.5); review and analyze AIG's motion for partial summary judgment and annotate same for opposition (1.6).	2.90	\$ 869.00	\$ 2,520.10			Admin (.5)
1/23/2023	C D STEKLOF	Communicate with Mr. Andrews regarding strategy for opposition to AIG's summary judgment motion and amended discovery responses (.8); communicate with Ms. Huckaba regarding revisions to written discovery responses (.6); review outstanding issues in connection with revisions and provide comments to same (.7); review statement of facts in support of AIG's summary judgment motion, exhibits to same, and relevant Florida authority regarding trigger theories under CGL policies (4.9).	7.00	\$ 869.00	\$ 6,083.00			
1/24/2023	C D STEKLOF	Review and analyze research into various legal issues related to opposition to AIG's motion for partial summary judgment including various trigger theories, mend the hold doctrine, and cases cited by AIG	7.10	\$ 869.00	\$ 6,169.90			
1/25/2023	C D STEKLOF	Revise amended responses to AIG's requests for production and interrogatories and communicate with Ms. Huckaba regarding same (2.5); review prior correspondence and amended complaints from underlying lawsuit in connection with opposition to summary judgment motion (3.0); draft opposition to AIG's motion for partial summary judgment (2.8).	8.30	\$ 869.00	\$ 7,212.70			

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
1/26/2023	C D STEKLOF	Draft opposition to AIG's motion for partial summary judgment regarding introduction and law regarding duty to defend and trigger theories	6.70	\$ 869.00	\$ 5,822.30			
1/27/2023	C D STEKLOF	Draft opposition to AIG's motion for partial summary judgment regarding Florida law on trigger theory and application of injury-in-fact and manifestation theories to present dispute	8.10	\$ 869.00	\$ 7,038.90			
1/28/2023	C D STEKLOF	Draft opposition to AIG's motion for partial summary judgment regarding mend the hold doctrine and policy language governing ability to recover defense expenses prior to filing of underlying lawsuit	6.90	\$ 869.00	\$ 5,996.10			
1/29/2023	C D STEKLOF	Draft opposition to AIG's motion for partial summary judgment regarding coverage for defense expenses prior to underlying lawsuit	1.00	\$ 869.00	\$ 869.00			
1/30/2023	C D STEKLOF	Prepare client for 30(b)(6) deposition (7.3); communicate with mediator and Mr. Andrews regarding AIG settlement offer (.3); finalize and serve amended discovery responses and exchange various correspondence with opposing counsel regarding same (1.5).	9.10	\$ 869.00	\$ 7,907.90			
1/31/2023	C D STEKLOF	Analyze various issues related to response to AIG's statement of facts and affidavit for Mr. Kurtz (.7); communicate with client and Mr. Andrews regarding 30(b)(6) deposition and next steps in connection with litigation (1.0); draft opposition to summary judgment motion regarding fees and expenses incurred before underlying lawsuit and revise same (4.4).	6.10	\$ 869.00	\$ 5,300.90			Admin (1)
2/1/2023	C D STEKLOF	Communicate with mediator and client regarding settlement discussions and draft correspondence to mediator regarding same (1.0); exchange correspondence with opposing counsel regarding ongoing discovery disputes (.7); draft opposition to summary judgment motion regarding summary of material facts and conclusion (2.0); revise opposition, incorporate revisions from Mr. Andrews, and review procedural requirements in connection with statement of facts and filing of exhibits (6.6).	10.30	\$ 869.00	\$ 8,950.70			Admin (1)
2/2/2023	C D STEKLOF	Draft and revise Kurtz affidavit in support of summary judgment opposition (2.0); draft and revise U.S. Sugar's responses to AIG's statement of facts (2.7); draft and revise U.S. Sugar's own statement of additional facts (2.6); analyze exhibits for filing with summary judgment opposition (1.5); review materials appropriate for notice of filing (1.5); analyze various procedural requirements in connection with filing summary judgment opposition (.7).	11.00	\$ 869.00	\$ 9,559.00			
2/3/2023	C D STEKLOF	Revise and finalize Kurtz affidavit in support of summary judgment opposition (1.5); revise and finalize U.S. Sugar's responses to AIG's statement of facts (1.5); revise and finalize U.S. Sugar's own statement of additional facts (1.0); revise notice of filing and review final exhibits for filing in connection with opposition (2.0); incorporate additional revisions to opposition from team (1.5); review final draft of opposition and incorporate final revisions to same (3.5); coordinate filing of opposition (.9).	11.90	\$ 869.00	\$ 10,341.10			Admin (.9)

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
2/6/2023	C D STEKLOF	Address various issues related to filing of motion to address issues with AIG discovery (.5); coordinate gathering of research into Greenberg Traurig fee applications in connection with rebuttal expert report (1.0); exchange correspondence with opposing counsel regarding outstanding issues related to discovery (.7); address various issues related to case strategy, discovery, and scheduling of depositions (.8).	3.00	\$ 869.00	\$ 2,607.00			Admin (.8)
2/7/2023	C D STEKLOF	Analyze issues related to rebuttal expert report and content of same (1.0); analyze filing of discovery motion regarding outstanding issues with AIG's written discovery (.5); address various issues related to additional documents for production and analyze various materials to be finalized for production to AIG (1.0); analyze expert report from AIG and communicate with Mr. Hawkins regarding content of rebuttal (1.8).	4.30	\$ 869.00	\$ 3,736.70			
2/8/2023	C D STEKLOF	Review court order regarding discovery motion and communicate with Mr. Andrews regarding same and next steps (.5); draft correspondence to mediator regarding request for settlement meeting (.4); communicate with mediator regarding potential settlement meeting, discuss same with client, and draft correspondence to mediator regarding meeting conditions (1.0); communicate with team regarding upcoming litigation tasks (.5); address various issues related to discovery (.8).	3.20	\$ 869.00	\$ 2,780.80			
2/9/2023	C D STEKLOF	Communicate with expert regarding rebuttal report (1.0); [REDACTED] (1.2); analyze additional research to undercut AIG fee expert opinions (.5); analyze various issues related to discovery, depositions, and next steps in connection with litigation (1.0).	3.70	\$ 869.00	\$ 3,215.30	Bad Faith (1.2)		
2/10/2023	C D STEKLOF	Communicate with mediator regarding discussion with AIG and draft correspondence to team regarding same (.6); communicate with Mr. Andrews and client regarding same and appropriate response (.8); communicate with client regarding call with AIG (.3); communicate with Mr. Hawkins regarding content of rebuttal report and draft correspondence to team regarding same (.9); analyze various research issues in connection with reasonableness of fees and additional information from public records to discredit AIG's expert report (.9).	3.50	\$ 869.00	\$ 3,041.50			Admin (1.1)
2/12/2023	C D STEKLOF	Review AIG's reply in support of motion for summary judgment and exchange correspondence regarding same	0.60	\$ 869.00	\$ 521.40			
2/13/2023	C D STEKLOF	Communicate with Mr. Andrews regarding AIG's reply on summary judgment motion and potential sur-reply to same (.7); exchange various correspondence regarding deposition scheduling (.4); analyze updated schedules reflecting total covered fees and costs incurred by client and analyze issues related to same for negotiation purposes (1.1).	2.20	\$ 869.00	\$ 1,911.80			Admin (.4)
2/14/2023	C D STEKLOF	Analyze updated calculations of fees and costs incurred by U.S. Sugar and communicate with Ms. Chapunoff regarding issues related to same (1.0); compile detailed analysis to client regarding same and recommendation in connection with ongoing settlement discussions with AIG (1.7); review analysis of case law related to reasonableness of fees incurred and issues related to same (.8).	3.50	\$ 869.00	\$ 3,041.50			Admin (2.7)

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
2/15/2023	C D STEKLOF	Review draft of expert rebuttal report and communicate with expert regarding necessary revisions (1.2); communicate with client regarding settlement discussions with AIG (.5); analyze additional research necessary regarding reasonableness of fees incurred (.7).	2.40	\$ 869.00	\$ 2,085.60			Admin (.5)
2/16/2023	C D STEKLOF	Analyze status of negotiations with AIG and next steps (.2); review research regarding presumptive reasonableness of attorneys' fees under Florida law (.3).	0.50	\$ 869.00	\$ 434.50			
2/17/2023	C D STEKLOF	Review updated rebuttal expert report and incorporate proposed revisions to same	1.80	\$ 869.00	\$ 1,564.20			
2/18/2023	C D STEKLOF	Communicate with expert in order to finalize rebuttal report	0.20	\$ 869.00	\$ 173.80			
2/20/2023	C D STEKLOF	Review final draft of rebuttal expert report and serve same on opposing counsel	0.30	\$ 869.00	\$ 260.70			
2/21/2023	C D STEKLOF	[REDACTED]	1.00	\$ 869.00	\$ 869.00	Bad Faith		
2/22/2023	C D STEKLOF	Review 30(b)(6) deposition transcript	0.80	\$ 869.00	\$ 695.20			
2/25/2023	C D STEKLOF	Evaluate potential issues to address through motions in limine	0.20	\$ 869.00	\$ 173.80			
2/26/2023	C D STEKLOF	Evaluate timing of 30(b)(6) and expert depositions	0.10	\$ 869.00	\$ 86.90			
2/27/2023	C D STEKLOF	Address issues related to deposition scheduling	0.20	\$ 869.00	\$ 173.80			Admin
2/28/2023	C D STEKLOF	Analyze next steps in connection with litigation and potential motions in limine	0.40	\$ 869.00	\$ 347.60			
3/1/2023	C D STEKLOF	Exchange correspondence regarding deposition scheduling and request for production to U.S. Sugar's expert	0.20	\$ 869.00	\$ 173.80			Admin
3/2/2023	C D STEKLOF	Exchange various correspondence regarding deposition scheduling and issues related to same	0.30	\$ 869.00	\$ 260.70			Admin
3/6/2023	C D STEKLOF	Analyze potential motions in limine and next steps in connection with litigation (.5); address various issues related to deposition scheduling and content of 30(b)(6) deposition (.5); [REDACTED] and potential issues regarding AIG's expert discovery document request (1.7).	2.70	\$ 869.00	\$ 2,346.30	Bad Faith (1.7)		Admin (.5)
3/7/2023	C D STEKLOF	Analyze issues related to motions in limine and exchange various correspondence regarding necessary research related to same (1.0); analyze outstanding issues related to calculation of damages and additional documents to be produced (.5); review written discovery, summary judgment briefing, and AIG production and outline key admissions to obtain during insurer's 30(b)(6) deposition (4.3).	5.80	\$ 869.00	\$ 5,040.20			
3/8/2023	C D STEKLOF	Prepare for AIG 30(b)(6) deposition (6.9); review research and analysis relating to forthcoming motions in limine (.5).	7.40	\$ 869.00	\$ 6,430.60			
3/9/2023	C D STEKLOF	Prepare for AIG 30(b)(6) deposition (5.8); address outstanding issues with invoices (.3); communicate regarding research related to motions in limine (.5).	6.60	\$ 869.00	\$ 5,735.40			
3/10/2023	C D STEKLOF	Prepare for and outline AIG 30(b)(6) deposition and complete review of exhibits	4.70	\$ 869.00	\$ 4,084.30			

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
3/13/2023	C D STEKLOF	Conduct 30(b)(6) deposition of AIG corporate representative and exchange follow-up correspondence regarding transcript (7.0); communicate with client regarding same and next steps (1.0); analyze various issues related to trial strategy going forward (1.0); analyze research surrounding notice of supplemental authority and motions in limine and consider content of same (1.5); review relevant portions of deposition transcript for notice of supplemental authority to court and draft same (1.0).	11.50	\$ 869.00	\$ 9,993.50			Admin (1)
3/14/2023	C D STEKLOF	Analyze key portions of AIG 30(b)(6) deposition transcript to support Notice of Supplemental Authority and draft same with supporting evidence from summary judgment briefing (4.3); analyze potential ethical issues related to AIG's retention of Dentons and draft proposed correspondence to opposing counsel regarding same (2.0); address various issues related to production of documents and reconciliation of damages incurred (.5).	6.80	\$ 869.00	\$ 5,909.20		Conflict (2)	
3/15/2023	C D STEKLOF	Review complete 30(b)(6) deposition transcript and annotate key portions for use in connection with Motions in Limine (2.0); outline various Motions in Limine to narrow scope of trial (1.0); review authority related to Motions in Limine and examples of same to address outstanding pretrial issues (2.0); analyze various issues related to Dentons' conflict of interest with AIG representation and next steps with same (1.1).	6.10	\$ 869.00	\$ 5,300.90		Conflict (1.1)	
3/16/2023	C D STEKLOF	Draft various Motions in Limine in order to narrow scope of trial (5.5); analyze various issues related to same and trial strategy (1.5); confer with opposing counsel regarding threat to strike notice of AIG's 30(b)(6) testimony and exchange correspondence regarding same (1.0).	8.00	\$ 869.00	\$ 6,952.00			
3/17/2023	C D STEKLOF	Draft and revise various motions in limine	8.30	\$ 869.00	\$ 7,212.70			
3/18/2023	C D STEKLOF	Exchange correspondence regarding revisions to motions in limine	0.20	\$ 869.00	\$ 173.80			
3/19/2023	C D STEKLOF	Draft and revise motions in limine	3.30	\$ 869.00	\$ 2,867.70			
3/20/2023	C D STEKLOF	Communicate regarding ongoing conflict issue with Dentons (.5); exchange correspondence with opposing counsel regarding same and conduct conferral regarding motions in limine (1.0); draft and revise motions in limine (6.1).	7.60	\$ 869.00	\$ 6,604.40		Conflict (1.5)	
3/21/2023	C D STEKLOF	Analyze necessary supplement to motions in limine (.5); draft, revise, and finalize motions in limine and coordinate filing of same (9.0); draft and revise response to AIG motion seeking leave to file extended response to Notice of Supplemental Authority (1.3).	10.80	\$ 869.00	\$ 9,385.20		Conflict (1.3)	Admin (9)
3/22/2023	C D STEKLOF	Revise and finalize response to AIG's motion for leave to file five-page brief on deposition transcript (.5); analyze various issues related to motions in limine and next steps in connection with litigation (.5) [REDACTED] (1.4).	2.40	\$ 869.00	\$ 2,085.60	Bad Faith (1.4)		
3/23/2023	C D STEKLOF	Analyze next steps in connection with litigation, appropriate response to AIG's updated coverage letters, and Dentons conflict issue	2.20	\$ 869.00	\$ 1,911.80		Conflict	

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
3/24/2023	C D STEKLOF	Communicate with client and Mr. Schwinghammer regarding conflict issue with Dentons (1.0); communicate with Ms. Faglioni regarding same and compile summary and relevant materials for research and analysis under governing ethics and conflicts rules (1.2); address various issues related to next steps in connection with litigation and trial preparation (1.5).	3.70	\$ 869.00	\$ 3,215.30		Conflict (2.2)	
3/26/2023	C D STEKLOF	Analyze upcoming litigation tasks and potential amendments to initial disclosures	0.30	\$ 869.00	\$ 260.70			
3/27/2023	C D STEKLOF	Address various issues related to Dentons conflict, potential disqualification motion, and communicate with client regarding same (2.0); draft and revise proposed correspondence to AIG general counsel regarding conflict issue (1.0); analyze various materials in connection with response to AIG's motions in limine and address various issues related to discovery and amendment on complaint (2.4).	5.40	\$ 869.00	\$ 4,692.60		Conflict (3)	
3/28/2023	C D STEKLOF	Analyze AIG's motions in limine and outline appropriate responses to same (1.5); communicate with Ms. Perez regarding various issues related to litigation and tasks to complete (1.2); draft and revise proposed follow-up correspondence on Dentons conflict issue (.7); draft opposition to AIG's motions in limine (5.4).	8.80	\$ 869.00	\$ 7,647.20		Conflict (.7)	
3/29/2023	C D STEKLOF	Address various issues related to conflicts, discovery, and potential amendment of complaint (1.7); communicate with Mr. Andrews regarding notice of supplemental authority and draft/revise content of same (1.0).	2.70	\$ 869.00	\$ 2,346.30		Conflict (1.7)	
3/30/2023	C D STEKLOF	Address various issues related to litigation tasks and necessary research	0.60	\$ 869.00	\$ 521.40			
4/1/2023	C D STEKLOF	Draft and revise opposition to AIG's motions in limine	4.10	\$ 869.00	\$ 3,562.90			
4/2/2023	C D STEKLOF	Draft and revise opposition to AIG's motions in limine	1.70	\$ 869.00	\$ 1,477.30			
4/3/2023	C D STEKLOF	Communicate with team regarding upcoming litigation tasks (.5); analyze various issues related to trial logistics (.5); [REDACTED]; exchange various correspondence re a ed to motions in limine and proposed stipulations to opposing counsel (1.0); analyze court's order on summary judgment motion and exchange various correspondence with client regarding same (1.5); communicate regarding potential mediation and draft detailed correspondence to mediator regarding same (.7); [REDACTED]	9.70	\$ 869.00	\$ 8,429.30	Bad Faith (5.5)		Admin (1.5)
4/4/2023	C D STEKLOF	[REDACTED] (3.5); communicate with client regarding monetary outlook for coverage litigation (.4); exchange correspondence with opposing counsel regarding stipulations in connection with motions in limine (.5); communicate regarding issues related to analysis of invoices and remaining fees in dispute (.5); communicate regarding various issues related to order from court regarding fees associated with defense and next steps in connection with same (1.2); revise and finalize opposition to AIG's motions in limine (3.0); address various issues related to pretrial tasks (.9).	10.00	\$ 869.00	\$ 8,690.00	Bad Faith (3.5)		Admin (.4)



Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
4/5/2023	C D STEKLOF	Review research regarding reasonableness of attorneys fees as issue of fact for jury and communicate regarding same (1.0); analyze AIG's opposition to motions in limine and outline issues to address in reply to same (1.5); address various issues related to litigation tasks, upcoming deadlines, and litigation strategy (1.7).	4.20	\$ 869.00	\$ 3,649.80			
4/6/2023	C D STEKLOF	Communicate with client regarding potential trial witnesses on fees, analyze issues related to same, and draft correspondence regarding necessary amendments to Rule 26 disclosures (1.5); analyze AIG opposition to motions in limine and communicate regarding reply in support of U.S. Sugar's motions (1.0); communicate with team regarding various issues relating to litigation tasks (1.0); [REDACTED] 3.3).	6.80	\$ 869.00	\$ 5,909.20	Bad Faith (3.3)		Admin (1.5)
4/7/2023	C D STEKLOF	Communicate with mediator regarding factual update and potential second mediation with AIG (.5); communicate with Mr. Andrews regarding same and exchange various correspondence with client and mediator regarding same (.8) [REDACTED] (2.9); communicate with Mr. Schwinghammer regarding amendments to disclosures and potential trial witness (.7).	4.90	\$ 869.00	\$ 4,258.10	Bad Faith (2.9)		Admin (.8)
4/8/2023	C D STEKLOF	[REDACTED]	6.40	\$ 869.00	\$ 5,561.60	Bad Faith		
4/9/2023	C D STEKLOF	[REDACTED]	4.60	\$ 869.00	\$ 3,997.40	Bad Faith		
4/10/2023	C D STEKLOF	[REDACTED] (2.5); draft and revise reply in support of motions in limine (3.5); communicate with underlying counsel regarding potential participation as witnesses at trial (.7); address various issues related to litigation tasks and next steps (1.3)	8.00	\$ 869.00	\$ 6,952.00	Bad Faith (2.5)		
4/11/2023	C D STEKLOF	Revise and finalize reply in support of motions in limine (3.0); [REDACTED] (1.2); address various issues related to upcoming litigation tasks (.9).	5.10	\$ 869.00	\$ 4,431.90	Bad Faith (1.2)		
4/12/2023	C D STEKLOF	Communicate with team regarding case status and upcoming tasks in connection with litigation (1.0); revise and finalize correspondence to AIG regarding payment of undisputed amount and fees to date in coverage action (1.3); analyze memorandum regarding potential disqualification challenge to Dentons (1.0); exchange various correspondence regarding additional invoices to potentially include in damage model (.5); draft and revise proposed correspondence to AIG regarding refusal to remove Dentons as counsel (1.5); [REDACTED] (3.0); address various issues related to deposition Scheduling and upcoming litigation tasks(.6).	8.90	\$ 869.00	\$ 7,734.10	Bad Faith (3)	Conflict (2.5)	Admin (.6)
4/13/2023	C D STEKLOF	[REDACTED] (.5); conduct deposition prep session with Mr.Hawkins in advance of expert deposition (5.5); [REDACTED] 1.0); [REDACTED] (1.50); address various issues related to trial witnesses,amended disclosures, and various litigation tasks (2.6).	11.10	\$ 869.00	\$ 9,645.90	Bad Faith (3)		
4/14/2023	C D STEKLOF	[REDACTED] (.4); [REDACTED] (1.0); draft and revise proposed correspondence to AIG and AIG's counsel regarding Dentons conflict (1.2); [REDACTED] ( 1.0); communicate with Mr. Hawkins regarding lines of questioning for AIG expert witness (.4); review documents and prepare outline for deposition of Al G's fee expert (5.1).	9.10	\$ 869.00	\$ 7,907.90	Bad Faith (2.4)	Conflict (1.2)	

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
4/16/2023	C D STEKLOF	Prepare for and outline deposition of AIG's fee expert	3.50	\$ 869.00	\$ 3,041.50			
4/17/2023	C D STEKLOF	Review documents and outline deposition of AIG fee expert	7.20	\$ 869.00	\$ 6,256.80			
4/18/2023	C D STEKLOF	Review new documents produced by AIG's expert just prior to deposition (1.0); conduct deposition of AIG's fee expert (9.4); communicate with client regarding next steps related to amended complaint and related matters (.6); analyze and exchange various correspondence related to updated fee calculations for trial (1.5).	12.50	\$ 869.00	\$ 10,862.50	Bad Faith (.6)		Admin (.6)
4/19/2023	C D STEKLOF	Travel to and defend deposition of U.S. Sugar fee expert	12.30	\$ 869.00	\$ 10,688.70			
4/20/2023	C D STEKLOF	[REDACTED] (4.2); meet and confer with opposing counsel regarding joint pretrial stipulation and communicate with Ms. Perez regarding next steps (.7).	4.90	\$ 869.00	\$ 4,258.10	Bad Faith (4.2)		
4/21/2023	C D STEKLOF	[REDACTED]	0.40	\$ 869.00	\$ 347.60	Bad Faith		
4/24/2023	C D STEKLOF	Communicate with team regarding litigation status and upcoming tasks to prepare for trial (1.0); review and revise joint pretrial stipulation and address various issues related to exhibit list, trial witnesses, and upcoming deadlines (3.7).	4.70	\$ 869.00	\$ 4,084.30			
4/25/2023	C D STEKLOF	Communicate regarding efforts to compile additional invoices to supplement exhibit list and draft correspondence to client regarding same (.8); review materials received in connection with Hawaii action and draft correspondence regarding review of same to incorporate on exhibit list (1.0); analyze issues related to need to produce documents in order to utilize at trial (.7); revise joint pretrial stipulation and communicate with team regarding revisions to same before sharing with opposing counsel (2.0); address various issues related to joint pretrial stipulation, shared invoices with Florida Sugarcane League, and upcoming pretrial deadlines (2.0).	6.50	\$ 869.00	\$ 5,648.50			
4/26/2023	C D STEKLOF	Communicate with team regarding joint pretrial stipulation (.5); communicate with client regarding efforts to compile proof of payment for Golder invoices (.3); communicate with client regarding same and various issues related to trial prep (.6); draft correspondence to opposing counsel regarding status of attorneys' fees payment for coverage matter (.3); review various portions of Hawaii litigation docket and relevant articles for potential inclusion in exhibit list (1.0); review and revise potential voir dire questions for submission to Court and communicate regarding same (1.3); review and revise responses in support of AIG deposition designations (2.5); draft and revise joint pretrial stipulation and address various issues related to upcoming deadlines (2.6).	9.10	\$ 869.00	\$ 7,907.90			Admin (.6)

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
4/27/2023	C D STEKLOF	Review and analyze trial outline and inclusion of relevant exhibits (1.0); analyze various articles and related materials for addition to exhibit list (1.0); draft correspondence to team regarding call with client on various trial matters (.4); draft and revise proposed joint pretrial stipulation to share with opposing counsel (2.0); communicate regarding various issues related to upcoming filings and strategic approach to same (1.0); conduct conferral regarding joint pretrial stipulation and communicate regarding next steps in light of inability to reach agreement (1.3); draft and revise unilateral pretrial stipulation in light of inability to reach agreement with AIG (2.3).	9.00	\$ 869.00	\$ 7,821.00			Admin (1)
4/28/2023	C D STEKLOF	Draft and revise unilateral pretrial stipulations, Rule 26(a)(3) disclosures, responses in support of deposition designations, and proposed voir dire questions and coordinate filing of same	9.80	\$ 869.00	\$ 8,516.20			Admin
4/30/2023	C D STEKLOF	Draft correspondence to client regarding trial logistics (.7); draft correspondence regarding appropriate response to Akerman's request to withdraw from case (.4); draft and revise proposed correspondence regarding AIG's failure to pay attorneys' fees and costs in coverage litigation (1.1).	2.20	\$ 869.00	\$ 1,911.80		Conflict (.4)	Admin (.7)
5/1/2023	C D STEKLOF	Communicate with Ms. Huckaba regarding research into various issues (.3); communicate with Mr. Hawkins regarding support for jury instructions and trial exhibits (.8); communicate regarding various issues related to trial tasks and compilation of jury instructions (1.0); analyze pretrial stipulation and exhibit list filed by AIG (.7); review expert deposition transcript to draft demand for additional materials from Mr. Ranis (2.0); address various issues related to potential withdrawal of Akerman from matter (1.0); address various pretrial issues (.6).	6.40	\$ 869.00	\$ 5,561.60		Conflict (1)	
5/2/2023	C D STEKLOF	Communicate regarding various issues related to jury instructions (1.3); communicate regarding opposition to insurer's motion to strike trial witnesses (.5); communicate with client regarding various issues related to trial preparation and trial (.8); finalize request for documents from Mr. Ranis and send same (.5); address various issues related to jury instructions, pending motions, litigation tasks, and trial preparation (2.6).	5.70	\$ 869.00	\$ 4,953.30			Admin (.8)
5/3/2023	C D STEKLOF	Communicate regarding various issues related to draft jury instructions (.8); exchange various correspondence regarding issues related to trial preparation (1.0); communicate with team regarding jury instructions, trial witnesses, pending motions, and trial tasks (1.3); analyze issues related to preparation of outlines for trial witnesses (.5); review draft jury instructions and draft proposed revisions and comments to same (3.1).	6.70	\$ 869.00	\$ 5,822.30			
5/4/2023	C D STEKLOF	Address various issues related to draft jury instructions and revisions to same (2.0); analyze appropriate opposition to Akerman's motion to withdraw (1.0); analyze and communicate regarding potential strategy to seek total fees through summary judgment motion (2.0); complete tasks related to witness preparation and upcoming trial (2.9).	7.90	\$ 869.00	\$ 6,865.10		Conflict (1)	

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
5/5/2023	C D STEKLOF	Review analysis and issues related to insurer's motion to strike trial witnesses (.5); exchange various correspondence regarding use of demonstratives at trial (.5); review various correspondence received from insurer regarding Dentons conflict (.5); coordinate drafting and revisions related to objections to AIG's exhibit list and U.S. Sugar's proposed jury instructions and communicate regarding same (4.1); review and analyze proposed jury instructions from AIG and communicate regarding same (1.5); exchange various correspondence to coordinate pretrial witness prep sessions and materials for review by witnesses (1.0); review draft summary judgment motion (1.0); communicate regarding issues related to Akerman's withdraw motion (.5).	9.60	\$ 869.00	\$ 8,342.40		Conflict (1)	Admin (1)
5/6/2023	C D STEKLOF	Exchange various correspondence regarding various pleadings for filing and forthcoming Motion for Summary Judgment (.7); revise response to Akerman's motion to withdraw (1.8); revise draft Motion for Summary Judgment and draft supporting affidavit from Mr. Kurtz (3.0).	5.50	\$ 869.00	\$ 4,779.50		Conflict (1.8)	
5/7/2023	C D STEKLOF	Revise motion for summary judgment and draft supporting Kurtz affidavit (2.7); revise response regarding Akerman's motion to withdraw (.5).	3.20	\$ 869.00	\$ 2,780.80		Conflict (.5)	
5/8/2023	C D STEKLOF	Draft and revise motion for summary judgment, notice of filing summary judgment evidence, statement of material facts, and supporting affidavit from Mr. Kurtz and communicate regarding various issues related to same (9.5); address various issues related to monetary damages to be sought at trial (1.0).	10.50	\$ 869.00	\$ 9,124.50			
5/9/2023	C D STEKLOF	Draft, revise, and finalize motion for extension to file summary judgment motion, notice of filing summary judgment evidence, Kurtz affidavit, statement of material facts, and proposed Motion for Summary Judgment and coordinate filing of same	7.40	\$ 869.00	\$ 6,430.60			Admin
5/10/2023	C D STEKLOF	Analyze and outline response to AIG's motion to strike trial witnesses (1.5); communicate with client regarding various issues related to trial preparation and trial and address same with Mr. Andrews (1.3); communicate regarding response to motion to strike trial witnesses (.5); address various issues related to witness outlines and tasks in preparation for trial (1.0); analyze materials produced by Mr. Ranis based on expert deposition and exchange correspondence regarding same (.6); review and revise response to AIG's motion to strike trial witnesses (6.6).	11.50	\$ 869.00	\$ 9,993.50			Admin (1.3)
5/11/2023	C D STEKLOF	Review proposed revisions to response to motion to strike (.5); address various issues related to trial prep and trial logistics (1.0); draft correspondence to client regarding various motions pending before court, trial logistics, and related matters (1.0); communicate regarding issues related to witness outlines and preparation (.5); review and revise draft reply in support of motion for leave to amend complaint (2.7).	5.70	\$ 869.00	\$ 4,953.30	Bad Faith (2.7)		Admin (1)

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
5/12/2023	C D STEKLOF	Communicate regarding notice of filing to address objections to AIG trial exhibits (.4); communicate with Mr. Andrews regarding upcoming filings and next steps (.3); address various issues related to litigation tasks and trial preparation (1.0); revise and finalize opposition to AIG's motion to strike trial witnesses [REDACTED] (6.4).	8.10	\$ 869.00	\$ 7,038.90	Bad Faith (6.4)		
5/13/2023	C D STEKLOF	Analyze and outline response to AIG's opposition to motion for leave to file motion for summary judgment (1.5); draft reply in support of motion for leave to file summary judgment motion (5.6); draft correspondence regarding potential settlement discussions prior to trial (.6).	7.70	\$ 869.00	\$ 6,691.30			
5/14/2023	C D STEKLOF	Draft and revise reply in support of motion for extension to file proposed Motion for Summary Judgment	5.70	\$ 869.00	\$ 4,953.30			
5/15/2023	C D STEKLOF	Review direct examination outline for Mr. Hawkins and meet with expert witness to prepare for trial testimony (4.5); review court orders postponing trial and granting leave to file summary judgment motion (.5); draft various correspondence to witnesses regarding postponement and future planning for trial (.5); communicate with client regarding orders (.5); analyze various issues for research in connection with breach of duty to defend and recoverable damages and communicate with team to coordinate research efforts and continued preparation for trial (2.5).	8.50	\$ 869.00	\$ 7,386.50			Admin (.5)
5/16/2023	C D STEKLOF	Analyze various issues related to next steps with litigation in light of Court's order postponing trial (1.0); analyze necessary research into Florida case law on recoverable damages in connection with forthcoming reply in support of summary judgment (1.5); communicate with team and exchange various correspondence to coordinate upcoming litigation tasks and prepare for reply in support of summary judgment (2.4).	4.90	\$ 869.00	\$ 4,258.10			
5/17/2023	C D STEKLOF	Draft and revise correspondence to insurer regarding reimbursement of coverage litigation fees and costs and related issues in connection with payment of invoices (2.0); communicate with client and Mr. Schwinghammer regarding underlying vendor involvement and fees and draft notes in connection with same (1.8); review prior research regarding policyholder's ability to control defense after coverage denial and exchange correspondence regarding same (1.0); address various issues related to upcoming litigation tasks and next steps (.9).	5.70	\$ 869.00	\$ 4,953.30			
5/18/2023	C D STEKLOF	[REDACTED] (1.0); address various issues related to fees incurred by U.S. Sugar to coordinate second reimbursement from AIG (2.0); draft/revise correspondence to AIG demanding reimbursement of second tranche of fees and costs and draft correspondence to client regarding same (2.0); address various issues related to litigation strategy and ongoing research (1.3).	6.30	\$ 869.00	\$ 5,474.70	Bad Faith (1)		
5/19/2023	C D STEKLOF	Draft correspondence to client regarding update on recent court orders (.7); analyze various issues related to fees billed by Dentons and coordinate research into same (.5); address various issues related to trial preparation and next steps (1.5); review and annotate deposition transcript of Scott Hawkins (3.1); review proposal for settlement and draft correspondence regarding same (.7).	6.50	\$ 869.00	\$ 5,648.50			Admin (.7)

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
5/20/2023	C D STEKLOF	Exchange various correspondence regarding AIG's proposal for settlement	0.20	\$ 869.00	\$ 173.80			
5/21/2023	C D STEKLOF	Review various correspondence related to expert fees and costs and draft correspondence regarding proposal for settlement	0.60	\$ 869.00	\$ 521.40			
5/22/2023	C D STEKLOF	Analyze various issues related to proposal for settlement, prior research into same, and draft correspondence to team regarding additional research (2.2); communicate regarding offer and next steps (.6); review and annotate deposition testimony from Mr. Hawkins and exchange various correspondence regarding same (3.2); address various issues related to trial preparation and upcoming reply in support of summary judgment motion (1.5).	7.50	\$ 869.00	\$ 6,517.50			
5/23/2023	C D STEKLOF	Draft analysis to client regarding proposal for settlement served by AIG and potential implications (1.5); analyze various issues related to calculation of pre-judgment interest in order to evaluate proposal for settlement (1.0); communicate and analyze various issues related to witness preparation surrounding new trial date (1.2); communicate with team regarding current litigation tasks and witness outlines for trial preparation (1.0); draft various correspondence to witnesses regarding scheduling related to witness preparation for new trial date (1.0); address various issues related to research for trial and reply in support of summary judgment motion (1.4).	7.10	\$ 869.00	\$ 6,169.90			Admin (1)
5/24/2023	C D STEKLOF	Address various issues related to trial preparation (1.0); analyze prior fee applications filed by Dentons in S.D. Florida and draft correspondence to team regarding same (1.1).	2.10	\$ 869.00	\$ 1,824.90			
5/25/2023	C D STEKLOF	Draft analysis for client regarding budget projection and timeline for recovery (1.5); team meeting regarding various documents and related materials compiled for trial (1.5); communicate and exchange various correspondence regarding litigation tasks (1.7).	4.70	\$ 869.00	\$ 4,084.30			Admin (1.5)
5/26/2023	C D STEKLOF	Address issues related to finalizing errata sheet for Mr. Hawkins (.4); address various litigation tasks related to trial preparation and forthcoming reply in support of summary judgment motion (1.0).	1.40	\$ 869.00	\$ 1,216.60			
5/30/2023	C D STEKLOF	Draft and exchange various correspondence regarding issues related to new trial schedule (.7); coordinate final errata sheet from expert (.4); exchange various correspondence with opposing counsel regarding effort to file invoices under seal and review local rules regarding same (.8); address various issues in anticipation of AIG's opposition to summary judgment motion (1.4).	3.30	\$ 869.00	\$ 2,867.70			Admin (.4)
5/31/2023	C D STEKLOF	Analyze AIG's opposition to U.S. Sugar's summary judgment motion and response to statement of material facts and annotate same (3.0); analyze precedent on ability to recover all damages for breach of duty to defend (3.5); meet and confer with opposing counsel regarding trial scheduling and draft correspondence to team regarding same (.4); communicate with team regarding reply in support of summary judgment motion (.9); outline reply in support of summary judgment motion and review exhibits to support same (2.1).	9.90	\$ 869.00	\$ 8,603.10			
6/1/2023	C D STEKLOF	Communicate regarding reply in support of motion for summary judgment and potential request to continue trial (.8); draft reply in support of motion for summary judgment (8.5).	9.30	\$ 869.00	\$ 8,081.70			
6/2/2023	C D STEKLOF	Draft reply in support of U.S. Sugar's motion for summary judgment	7.90	\$ 869.00	\$ 6,865.10			

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
6/3/2023	C D STEKLOF	Draft and revise reply in support of motion for summary judgment and response to statement of additional facts asserted by AIG	7.00	\$ 869.00	\$ 6,083.00			
6/4/2023	C D STEKLOF	Exchange various correspondence regarding reply in support of summary judgment motion	0.40	\$ 869.00	\$ 347.60			
6/5/2023	C D STEKLOF	Exchange various correspondence in connection with revisions to reply in support of summary judgment	0.20	\$ 869.00	\$ 173.80			
6/6/2023	C D STEKLOF	Address various issues related to reimbursement of defense costs and letter to AIG regarding same	1.00	\$ 869.00	\$ 869.00			
6/12/2023	C D STEKLOF	Address various issues related to trial scheduling, witness preparation, upcoming litigation tasks, and opposition to AIG's summary judgment motion (2.4); communicate with team regarding same and opposition to AIG's motion for summary judgment (.8); analyze various issues related to reimbursement of fees and costs from AIG (.5); analyze AIG's motion for summary judgment, related materials, research performed in connection with same, and prior deposition transcripts in connection with opposition (4.8).	8.50	\$ 869.00	\$ 7,386.50			
6/13/2023	C D STEKLOF	Analyze research regarding various issues in connection with opposition to AIG's motion for summary judgment and communicate regarding additional research and tasks for opposition (2.4); outline opposition to AIG's motion for summary judgment (4.9).	7.30	\$ 869.00	\$ 6,343.70			
6/14/2023	C D STEKLOF	Draft outline of opposition to AIG's motion for summary judgment on defense expenses (3.0); communicate with team regarding outline and analyze key issues to address in opposition (1.0); begin drafting opposition to AIG's motion for summary judgment (4.7).	8.70	\$ 869.00	\$ 7,560.30			
6/15/2023	C D STEKLOF	Draft opposition to AIG's second motion for summary judgment regarding reasonableness of defense expenses	7.60	\$ 869.00	\$ 6,604.40			
6/16/2023	C D STEKLOF	Review draft motion to continue trial and communicate regarding necessary revisions to same (.4); draft opposition to AIG's second motion for summary judgment regarding reasonableness of defense expenses (5.6).	6.00	\$ 869.00	\$ 5,214.00			
6/19/2023	C D STEKLOF	Draft opposition to AIG's cross motion for summary judgment on reasonable and necessary fees	4.20	\$ 869.00	\$ 3,649.80			
6/20/2023	C D STEKLOF	Draft opposition to AIG's second motion for summary judgment regarding reasonableness and necessity of Defense Expenses (10.8); review draft motion to continue trial and communicate with Ms. Perez regarding same (.6); communicate regarding response to AIG's statement of material facts (.4).	11.80	\$ 869.00	\$ 10,254.20			
6/21/2023	C D STEKLOF	Work on revisions to opposition to AIG's summary judgment motion (.5); analyze issues related to opposition to AIG's statement of material facts (.7); conduct research to further support opposition (1.0); review and revise opposition to summary judgment motion (8.2).	10.40	\$ 869.00	\$ 9,037.60			
6/22/2023	C D STEKLOF	Revise opposition to AIG's summary judgment motion, incorporate final additions and changes to same, and review final draft for filing with Court (6.6); review and revise opposition to AIG's statement of material facts in support of summary judgment motion (3.0); coordinate filing of opposition and related materials (.7).	10.30	\$ 869.00	\$ 8,950.70			Admin (.7)



Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
6/26/2023	C D STEKLOF	Analyze motion to continue trial, various correspondence related to same, and Court order granting motion (1.0); analyze next steps regarding pretrial preparation and status conference in light of same (.8); address various issues related to preparation for status conference in light of numerous pending motions and scheduling issues for attorneys and witnesses (3.6).	5.40	\$ 869.00	\$ 4,692.60			
6/27/2023	C D STEKLOF	Address various issues related to trial preparation and status conference with Court to set trial date and potentially address pending motions	1.80	\$ 869.00	\$ 1,564.20			
6/28/2023	C D STEKLOF	Analyze scheduling conflicts for trial witnesses, communicate regarding same, and prepare for status conference with Court	1.70	\$ 869.00	\$ 1,477.30			Admin
6/29/2023	C D STEKLOF	Analyze issues related to special setting trial and conflicts in connection with same (.7); address various issues related to preparation for court conference to address same (.8); draft analysis regarding timeline for future recovery and potential outcomes associated with summary judgment motions (1.6).	3.10	\$ 869.00	\$ 2,693.90			
6/30/2023	C D STEKLOF	Address various issues related to trial planning, coordination of witnesses, and preparation for status conference with Court and potential argument on pending motions	1.70	\$ 869.00	\$ 1,477.30			Admin
7/3/2023	C D STEKLOF	Revise analysis to client regarding case timeline and related matters in light of recent court order (.4); exchange correspondence with expert regarding case status (.2); address various issues related to litigation and next steps (1.1).	1.70	\$ 869.00	\$ 1,477.30			Admin (.4)
7/5/2023	C D STEKLOF	Draft correspondence to AIG regarding failure to receive reimbursement for second tranche of attorneys' fees and costs in order to obtain payment	0.40	\$ 869.00	\$ 347.60			
7/6/2023	C D STEKLOF	Analyze correspondence from AIG regarding refusal to reimburse second tranche of attorneys' fees and costs and outline response to same (.8); draft response to AIG regarding same in order clarify record (3.2); address various issues related to expert and deposition invoices (.6).	4.60	\$ 869.00	\$ 3,997.40			Admin (.6)
7/7/2023	C D STEKLOF	Draft and revise correspondence to AIG regarding refusal to reimburse second tranche of defense expenses (2.2); revise analysis to client regarding future budget and timeline for recovery (.7); draft and revise analysis to client regarding AIG's refusal to pay further defense expenses and future recovery under Florida fee shifting statute (1.5); address various issues related to litigation and next steps in connection with same (1.3).	5.70	\$ 869.00	\$ 4,953.30			Admin (2.2)
7/10/2023	C D STEKLOF	Finalize and send correspondence to client regarding budgeting, timeline for recovery, and AIG's refusal to reimburse defense expenses (.5); analyze issues to address prior to status hearing with Court (.7); communicate with client regarding budgeting (.5); calculate interest owed in connection with outstanding amounts owed by AIG and draft correspondence to client regarding same (.5); address issues related to litigation and response to AIG on refusal to reimburse defense expenses (1.0).	3.20	\$ 869.00	\$ 2,780.80			Admin (1)

Date	Timekeeper	Description	Hours	Rate	Amount	Bad Faith	Conflict	Admin
7/11/2023	C D STEKLOF	[REDACTED] (.5); finalize correspondence to AIG regarding refusal to reimburse defense expenses and address various issues related to litigation (.9).	1.40	\$ 869.00	\$ 1,216.60	Bad Faith (.5)		
7/14/2023	C D STEKLOF	Analyze Al G's reply in support of motion for summary judgment (.9); analyze issues related to recoverability of fees under Florida's fee shifting statute (1.0).	1.90	\$ 869.00	\$ 1,651.10			
7/20/2023	C D STEKLOF	Review strategy regarding most recent developments in litigation and address various issues in connection with same going forward	1.40	\$ 869.00	\$ 1,216.60			
7/25/2023	C D STEKLOF	Analyze potential motions that could be subject to oral argument at forthcoming court hearing	0.20	\$ 869.00	\$ 173.80			
7/31/2023	C D STEKLOF	Exchange correspondence with client regarding various issues related to next steps with litigation	0.20	\$ 869.00	\$ 173.80			
8/1/2023	C D STEKLOF	Address various issues in preparation for hearing to special set trial	0.30	\$ 869.00	\$ 260.70			
8/2/2023	C D STEKLOF	Review correspondence from opposing counsel and U.S. Sugar's witnesses regarding availability for trial (.4); address various issues in preparation for upcoming court hearing to set trial date (.8).	1.20	\$ 869.00	\$ 1,042.80			